Datatreasury Corporation v. City National Corporation et al Doc. 13 Att. 13

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

DATATREASURY CORP.,	§	No. 2:06CV-165 (DF)
Plaintiff	§	Hon. David J. Folsom
	§	JURY TRIAL DEMANDED
vs.	§	
	§	**DECLARATION OF JEAN ZERRUDO IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS FOR LACK OF PROPER VENUE**
CITY NATIONAL CORPORATION; and CITY NATIONAL BANK,	§	
	§	
Defendants.	§	
	§	

I, Jean Zerrudo, declare as follows:

1. I am currently the Vice President & Group Product Manager, Cash Management Services at City National Bank (the "Bank"). I am responsible for the management of the Bank's City National E-Deposit product and maintain the client user database for the product. I make this declaration in support of Defendants' Motion to Dismiss for Lack of Proper Venue in the matter of DataTreasury Corp. v. City National Corporation, *et al.*, No. 2:06CV-165 (DF), pending in the United States District Court for the Eastern District of Texas. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. The Bank's City National E-Deposit product, which allows certain qualifying business customers to deposit checks remotely using specialized scanners and software, has not been implemented for any business in the Eastern District of Texas. Nor has the Bank had any communications with anyone, or solicited anyone, in the Eastern District of Texas

Dockets.Justia.com

about the possibility of participating in the City National E-Deposit product. The product was just recently launched for the California and New York markets in May 2006.

Executed on May 31, 2006, at ____________.

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct.

Jean Zerrudo